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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

AURORA REGINO,

Plaintiff,

vs.

SUPERINTENDENT KELLY STALEY, in her official
capacity as Superintendent of the Chico
Unified School District,

Defendant.

Case No.: 2:23-cv-00032-JAM-DMC

**STIPULATION AND ORDER TO EXTEND
DEADLINE FOR DEFENDANT
SUPERINTENDENT KELLY STALEY TO FILE
RESPONSE TO SECOND AMNEDED
COMPLAINT TO JULY 9, 2025**

Second Amended Complaint Filed: 6/11/2025
Complaint Filed: 1/6/2023
Trial Date: Not Yet Set

Plaintiff AURORA REGINO ("Plaintiff") and Defendant SUPERINTENDENT KELLY STALEY ("Superintendent Staley") by and through their respective counsel of record, submit the following stipulation and proposed order seeking an extension of the deadline for Superintendent Staley to file her response to the Second Amended Complaint in the above-captioned matter ("SAC"), from the current deadline of June 25, 2025, to July 9, 2025 – an extension of 14 days.

WHEREAS, on July 11, 2023, this Court granted Superintendent Staley's Rule 12 motion to dismiss the First Amended Complaint filed in the above-captioned matter in its entirety, without leave to amend (ECF 57); and

WHEREAS, on April 4, 2025, the United States Court of Appeals for the Ninth Circuit vacated that order, and remanded the matter back to this Court for further consideration (ECF 69); and

WHEREAS, on June 4, 2025, Plaintiff filed a consent motion with this Court to file the operative SAC (ECF 82); and

WHEREAS, on June 11, 2025, this Court granted that consent motion, and ordered Superintendent Staley to respond to the amended pleading within fourteen days – i.e., June 25, 2025 (ECF 85); and

WHEREAS, the SAC consists of both 31 pages of pleadings and approximately 905 pages of exhibits (ECF 84-84.10); and

WHEREAS, Superintendent Staley intends to file a new Rule 12 motion seeking dismissal of the operative SAC in its entirety; and

WHEREAS, in the interests of equity, Plaintiff agrees that Superintendent Staley should be afforded additional time to prepare her Rule 12 motion;

IT IS HEREBY STIPULATED by and between the parties that the Court should grant Superintendent Staley leave to file her response to the SAC by no later than July 9, 2025.

Dated: June 13, 2025

LEONE ALBERTS & DUUS

/s/ Jimmie E. Johnson

LOUIS A. LEONE, ESQ.

Of Counsel

BRIAN A. DUUS, ESQ.

JIMMIE E. JOHNSON, ESQ.

Attorneys for Defendant

Dated: June 13, 2025

**CENTER FOR AMERICAN LIBERTY
DHILLON LAW GROUP INC.**

/s/ Joshua W. Dixon

JOSHUA W. DIXON, ESQ.

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JESSE FRANKLIN-MURDOCK

Attorneys for Plaintiff

ORDER

The Court, having received, read, and considered the stipulation of the parties, and good cause appearing therefrom, adopts the stipulation of the parties in its entirety as its order. The Court specifically finds that the failure to grant the stipulation in this case would deny Defendant SUPERINTENDENT KELLY STALEY (“Superintendent Staley”) a reasonable opportunity to address all of the factual allegations and causes of action raised in the operative Second Amended Complaint (“SAC”) in her forthcoming response.

Accordingly, the Court grants Superintendent Staley leave to file her response to the SAC by no later than July 9, 2025.

IT IS SO ORDERED.

Dated: June 16, 2025

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE